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*Attorneys for Plaintiffs and the Proposed Class  
(Additional Counsel Listed on Signature Page)*

*Social Finance, Inc. d/b/a SoFi and  
SoFi Lending Corp. d/b/a SoFi*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

RUBEN JUAREZ, CALIN CONSTANTIN  
SEGARCEANU, EMILIANO GALICIA, and  
JOSUE JIMENEZ, on behalf of themselves  
and all others similarly situated,

Plaintiffs,

vs.

SOCIAL FINANCE, INC. d/b/a SOFI, and  
SOFI LENDING CORP. d/b/a SOFI,

Defendants.

Case No.: 4:20-cv-03386-HSG

**JOINT STIPULATION AND ORDER TO  
FURTHER STAY LITIGATION**

District Judge: Haywood S. Gilliam, Jr.  
Complaint filed: May 19, 2020  
First Amended Complaint Filed: July 30, 2020  
Second Amended Complaint Filed: May 3,  
2021

Pursuant to Civil Local Rules 6-1(b) and 6-2, Plaintiffs Ruben Juarez, Calin Constantin Segarceanu, Emiliano Galicia, and Josue Jimenez ("Plaintiffs"), through counsel, along with counsel for Defendants Social Finance, Inc. d/b/a SoFi and SoFi Lending Corp. d/b/a SoFi

(collectively, “SoFi,” and together with Plaintiffs, the “Parties”), respectfully submit the following Joint Stipulation and Proposed Order to Further Stay Litigation.

### **RECITALS**

WHEREAS, on May 19, 2020, Plaintiff Juarez filed a putative class action Complaint against SoFi in the above-captioned matter, asserting violations of the Civil Rights Act of 1866, 42 U.S.C. § 1981, and the California Unruh Civil Rights Act, Cal. Civil Code §§ 51, *et seq.*, (D.E. 1);

WHEREAS, on July 30, 2020, Plaintiffs Juarez and Segarceanu filed a First Amended Complaint, adding named Plaintiff Segarceanu and claims under the Fair Credit Reporting Act, 15 U.S.C. § 1681, *et seq.* (D.E. 33);

WHEREAS, on May 3, 2021, Plaintiffs filed a Second Amended Complaint (as authorized by the Court), incorporating additional named Plaintiffs Jimenez and Galicia (D.E. 56, 62);

WHEREAS, following the May 4, 2021 case management conference, the Court entered a Scheduling Order on May 12, 2021, pursuant to which fact discovery closes April 3, 2022 (D.E. 66);

WHEREAS, on July 15, 2021, the Parties participated in a private mediation session with JAMS arbitrator David Geronemus, Esq., during which they were ultimately unable to reach a settlement;

WHEREAS, on November 3, 2021, the Court approved the Parties’ Joint Stipulation seeking to stay the case through December 28, 2021 in order to focus on continued settlement discussions, but cautioned the Parties that if the case is not settled by December 28, 2021, they should be prepared to proceed under the current case schedule (D.E. 84);

WHEREAS, on December 28, 2021, the Parties provided an update to the Court that substantial process was made towards settlement (D.E. 85), and on January 3, 2022 the Court approved the Parties’ Joint Stipulation seeking to further stay the case through January 27, 2022 (D.E. 86).

1 WHEREAS, since that time, the Parties have reached an agreement on nearly all material  
2 terms and are in the process of documenting the settlement, and accompanying class action  
3 settlement notice and claim form, in a written agreement;

4 WHEREAS, the Plaintiffs expect to file for preliminary approval within 60 days;

5 WHEREAS, a continued stay will further conserve judicial resources and allow the parties  
6 to continue efforts towards documenting settlement; and

7 WHEREAS, the Parties affirm that no party will be prejudiced by this stipulation, nor will  
8 the requested extension unduly delay the case;

9 **STIPULATION**

10 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs  
11 and SoFi through their respective undersigned counsel that:

- 12 1. All formal discovery, discovery obligations and motion practice shall be suspended  
13 and stayed for another 60 days, (until March 28, 2022) to enable the Parties to  
14 conserve resources and focus their efforts on settlement;
- 15 2. Plaintiffs will file for preliminary approval on or before March 28, 2022, or the  
16 parties will submit an update to the Court in which they will apprise the Court of the  
17 status of their settlement efforts and expected timing for the filing of a motion for  
18 preliminary approval;
- 19 3. This stipulation is without prejudice to the rights, claims, arguments, and defenses of  
20 all Parties; and
- 21 4. All other signatories listed, and on whose behalf the filing is submitted, concur with  
22 the content in this Stipulation and have authorized the filing.

23 IT IS SO STIPULATED.

OUTTEN & GOLDEN LLP

MCGUIRE WOODS LLP

Dated: January 27, 2022

Dated: January 27, 2022

By: /s/ Ossai Miazad  
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Constantin Segarceanu, Emiliano Galicia,  
Josue Jimenez and the Proposed Class*

**ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED,**

DATED: 1/28/2022

A handwritten signature in black ink, reading "Haywood S. Gilliam, Jr.", written over a horizontal line.

Haywood S. Gilliam, Jr  
United States District Judge